

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C. A. No. 05-823-***
	)	
STANLEY TAYLOR, et al.,	)	JURY TRIAL REQUESTED
	)	
Defendants.	)	

**DEFENDANT CARL ANSON'S RESPONSE  
TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

Pursuant to Federal Rule of Civil Procedure 36, Defendant responds to Plaintiff's Request for Admissions as follows:

1. Plaintiff George A. Jackson's July 19, 2005, grievance was filed as an "Emergency Grievance" and received by the SCI Warden's Office on July 20, 2005.

**RESPONSE:** Admitted.

2. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate for processing through the normal Inmate Grievance Procedure (IGP) by the SCI's Warden's Office.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny the statement.

3. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was received by the Chairman on July 21, 2005.

**RESPONSE:** Admitted.

4. Plaintiff George A. Jackson's July 19, 2005, "Emergency Grievance" was not returned to the inmate as unprocessed grievance by the SCI Grievance Chairman.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny the statement.

5. During all times relevant to the filing and reviewing of Plaintiff George A. Jackson's "emergency grievance" the Inmate Grievance Chairman was Michael J. Atallian.

**RESPONSE:** Admitted. Answering Defendant's review of the documents provided indicates that Michael Atallian was the Inmate Grievance Chairman.

6. A description of George A. Jackson's "emergency grievance" states, "Inmate workers are constantly experiencing daily symptoms of heat exhaustion (excessive sweating, shortness of breath, etc.,) from the deprivation of an adequate ventilation at the work place."

**RESPONSE:** Admitted that these words are from inmate Jackson's grievance. Denied that inmate Jackson's grievance is factually correct.

7. A description of George A. Jackson's "emergency grievance" states, "...and compensate inmate workers for irreparable damages suffered from delay/denial of a safe and healthy work environment."

**RESPONSE:** See Response to No. 6.

8. All twenty-five named Plaintiffs was [sic] committed to the custody of the Department of Corrections, and work at the SCI main kitchen between July 2003 thru July 2005 as inmate kitchen workers.

**RESPONSE:** Answering Defendant has no personal knowledge.

9. DOC Food Service Department does not maintain certification records of SCI main kitchen, containing the name of person who performed the inspection of the kitchen.

**RESPONSE:** Answering Defendant has no personal knowledge.

10. Defendants have completed ServSafe training requirements as part of their training as a DOC Food Service Correctional Officer.

**RESPONSE:** Answering Defendant has no personal knowledge.

11. DOC Food Service staff has not been trained or educated in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

**RESPONSE:** Answering Defendant has no personal knowledge.

12. George A. Jackson's July 19, 2005, "Emergency Grievance" was granted in favor of the grievant by all three (3) levels of the Inmate Grievance Procedure.

**RESPONSE:** Admitted. Answering Defendant's review of the documents so indicates. See also Response to No. 6.

13. Since the filing of George A. Jackson's July 19, 2005, "Emergency Grievance" the exhaust ventilation system on the "old side of the SCI main kitchen has not been replaced, maintained and operated as to ensure the required protection by maintaining a volume and velocity of exhaust air sufficient to gather dusts, fumes, vapors or gases from the numerous commercial size convectional, conventional ovens and other commercial equipment.

**RESPONSE:** Answering Defendant has no personal knowledge.

14. The exhaust system shall be in operation continually during all operations which it is designed to serve.

**RESPONSE:** Admitted.

15. There are seven (7) inmate housing buildings within the SCI prison compound.

**RESPONSE:** Denied. Answering Defendant remembers only six (6) inmate housing buildings inside the secure compound.

16. According to the Inmate Grievance DOC Policy 4.4. V procedure:

H. INMATES ARE PROHIBITED FROM SUBMITTED [sic]  
MORE THAN ONE GRIEVANCE ARISING FROM A  
SINGLE INCIDENT.

**RESPONSE:** Answering Defendant retired from the DOC four years ago, therefore, he does not have sufficient knowledge to admit or deny the statement.

17. Plaintiff George A. Jackson's July 19, 2005, "emergency grievance" was a job issue.

**RESPONSE:** Admitted. Documents indicate the Inmate Grievance Chairman classified the grievance as a "job issue."

18. All inmate kitchen workers while working in the SCI main kitchen are housed in the same building.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny the statement.

19. There were no established and supervised programs for DOC Food Service staff at the SCI main kitchen prior to July 19, 2005, for the education and training of food service staff in the recognition, avoidance and prevention of unsafe conditions at the SCI main kitchen.

**RESPONSE:** Answering Defendant does not have sufficient knowledge to admit or deny the statement.

20. Employers need to periodically evaluate their training programs to see if the necessary skills, knowledge and routines are being properly understood and implemented by their trained employees.

**RESPONSE:** Admitted.

**STATE OF DELAWARE  
DEPARTMENT OF JUSTICE**

/s/ Catherine Damavandi  
Catherine Damavandi (ID # 3823)  
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Dated: January 2, 2008

***CERTIFICATE OF SERVICE***

I hereby certify that on January 2, 2008, I electronically filed the attached *Defendant Carl Anson's Response to Plaintiff's Request for Admissions* with the Clerk of Court using CM/ECF. I hereby certify that on January 2, 2008, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

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